



ENERGY AND ENVIRONMENT CABINET

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Leonard K. Peters
Secretary

June 9, 2015

Ms. Jennifer Woodard
US Department of Energy
Portsmouth/Paducah Project Site Office
PO Box 1410
Paducah, Kentucky 42002

RE: Comments on the Sitewide Evaluation Report for the Soils Operable Unit (DOE/LX/07-1256&D1)
Paducah Site
Paducah, McCracken County, Kentucky
KY8-890-008-982

Ms. Woodard:

Attached are Kentucky's comments on the D1 *Sitewide Evaluation Report for the Soils Operable Unit*, dated May 12, 2015.

If you have any questions or require additional information, please contact Gaye Brewer at (270) 898-8468, or e-mail at gaye.brewer@ky.gov.

Sincerely,

For April J. Webb, P.E., Manager
Hazardous Waste Branch

AJW:lww:geb

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DWM File: #1110; Graybar: AIN20110008 (Soils OU Sitewide Evaluation Report)
Attachment: Kentucky Comments

**Radiation Health Branch Comments Pertaining to the
Sitewide Evaluation Report for the Soils Operable Unit
Paducah Site, Paducah, Kentucky**

(DOE/LX/07-1256&D1)

June 8, 2015

Specific Comments:

1. Page 114, Section 6, 3rd bullet, 1st sub-bullet:

The underlying intent of this sub-bullet is to explain that the survey did not indicate the presence of contaminants (specifically U-238) that exceed any of the risk-based levels of concern. The current wording (specifically "did not result in readings that indicated that any of the anomalies pose a risk to human health") can easily be interpreted as stating that there is zero risk, which is not factual.

Please revise this bullet to explain which values (e.g. risk-based no action level for the child recreational user, etc.) were not exceeded rather than making statements about not posing risks to human health.

2. Page 117, Section 6, 5th bullet, 1st sub-bullet, 1st sentence:

A portion of this sentence currently reads: "the remaining 509 identified anomalies are not considered to be contaminated in accordance with the decision rules of the work plan (DOE 2014b) at a level of concern".

This order may lead to confusion. Please revise this portion to state "the remaining 509 identified anomalies are not considered to be contaminated at a level of concern, in accordance with the decision rules of the work plan (DOE 2014b)".